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9  
10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 **UNITED STATES OF AMERICA**

13 **2:13-CR-00039-JAD-VCF**

14 Plaintiff,

15 ECF No. 389

16 v.

17 **RAMON DESAGE,**

18 Defendant.

19 **HARVEY VECHERY'S MOTION TO EXTEND TIME TO FILE REPLIES TO**  
20 **GOVERNMENT RESPONSES (SECOND REQUEST)**

21 Harvey Vechery ("Mr. Vechery"), by and through his counsel of record, hereby submits  
22 this Motion to Extend Time to File Replies to the Government's Responses (ECF 372, 373).

23 This motion to extend time is the second request by Mr. Vechery. *See* LR IA 6-1. Mr.  
24 Vechery requests that this Honorable Court grant him additional time to file a reply to the  
25 government's responses filed on November 21, 2019 (ECF 372,373).

26 As detailed in Mr. Richardson's motion to extend time (ECF 387), it was recently  
27 uncovered that Civil Complaints for Forfeiture in Rem were filed by the government, under  
28 seal, in 2013. Moreover, the government recently filed Amended Civil Complaints for  
Forfeiture in Rem which relate to the seized funds at issue. These new developments may  
greatly alter any analysis relating the seized funds. Therefore, Mr. Vechery and his counsel will  
need additional time to properly determine what impact these complaints may have.

1 Mr. Hollingsworth, on behalf of the government, agreed to extend the deadline to file  
2 replies to January 6, 2020 via email and counsel for Mr. Richardson "has no objection to the  
3 requested Reply deadline also being applicable to Counsel for Mr. Vechery." (See ECF 387 2:8-  
4 10).

5 Mr. Vechery requests the same extension of time to January 6, 2020. This motion is not  
6 submitted for the purpose of delay or any other improper purpose but is made to allow Mr.  
7 Vechery adequate time to file any reply. The current deadline to file a reply is December 12,  
8 2019 after the initial extension granted by this Court. Given the parties' agreement to allow  
9 replies through January 6, 2020, Mr. Vechery asks that this Court allow him the extension of  
10 time.

11 Accordingly, this Honorable Court should grant the instant motion and allow Mr.  
12 Vechery to file any reply to the government Responses (ECF 372,373) through January 6, 2020.

13  
14 Dated this 11<sup>th</sup> day of December, 2019.

15 HUTCHISON & STEFFEN, PLLC

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17 /s/ Patricia Lee

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25 ***IT IS SO ORDERED:***

26   
27 ***HONORABLE JENNIFER A. DORSEY***  
28 ***UNITED STATES DISTRICT JUDGE***

***DATED:*** 12/11/2019